

EXHIBIT 1

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4 CASE NO. 3:07-CV-05944-SC
5 MDL NO. 1917

6 IN RE: CATHODE RAY TUBE (CRT)
7 ANTITRUST LITIGATION

8 _____
9 This Document Relates to:
10 ALL ACTIONS
11 _____/

12 Kenny Nachwalter, P.A.
13 201 South Biscayne Boulevard
14 Suite 1100
15 Miami, Florida 33131
16 Tuesday, November 4th, 2014
17 12:58 p.m. - 1:45 p.m.

18 DEPOSITION OF PATRICK BARRETT
19 as 30(b)(6) representative of Hitachi, Ltd.

20 Taken before Beverly Bourlier James,
21 Registered Professional Reporter, Certified Realtime
22 Reporter and Notary Public in and for the State of
23 Florida at Large, pursuant to Notice of Taking
24 Deposition filed in the above-mentioned cause.
25

1 A. Yes, I am.

2 Q. And you understand you're giving testimony
3 today on behalf of Hitachi, Ltd.?

4 A. Yes.

5 Q. Okay, and you've seen the 30(b)(6)
6 deposition notice?

7 A. Yes.

8 Q. Okay. So I'm going to read you some
9 questions that I've previously submitted to your
10 counsel, okay?

11 A. Yes.

12 Q. Between March 1, 1995 and November 30,
13 2007, what was the percentage amount, if any, of
14 Hitachi, Ltd.'s ownership interest in Hitachi
15 America, Ltd.?

16 A. Hitachi, Ltd. had a 100 percent ownership
17 interest in Hitachi America, Ltd. during this period.

18 Q. Between March 1, 1995 and November 30,
19 2007, was Hitachi America, Ltd. a wholly owned
20 subsidiary of Hitachi, Ltd.?

21 A. Yes.

22 Q. As of today, was Hitachi America, Ltd. a
23 wholly owned subsidiary of Hitachi, Ltd.?

24 A. Yes.

25 Q. During the relevant period, did Hitachi,

1 during the relevant period did HHTA sell CRT
2 televisions, that answer is, upon information and
3 belief, no.

4 Q. Okay. Thank you.

5 During the relevant period, did Hitachi
6 High-Technologies America, Inc. manufacture CRT
7 computer monitors?

8 A. No.

9 Q. In what countries, if any, did Hitachi
10 High-Technologies America, Inc. sell CRT products?

11 A. Upon information and belief, there are
12 none.

13 Q. In what countries, if any, did Hitachi
14 High-Technologies America manufacture CRT products?

15 A. Hitachi High-Technologies America did not
16 manufacture CRT products.

17 Q. When, if ever, is Hitachi, Ltd. first
18 maintain an ownership interest in Hitachi Displays,
19 Ltd.?

20 A. Hitachi, Ltd. first obtained an ownership
21 interest in Hitachi Displays, Ltd. upon its formation
22 on October 1, 2002.

23 Q. Between October 1, 2002 and November 30,
24 2007, what was the percentage amount, if any, of
25 Hitachi, Ltd.'s ownership interest in Hitachi

1 Displays, Ltd.?

2 A. From October 1, 2002 to November 30, 2007,
3 Hitachi, Ltd. had a 100 percent ownership interest in
4 Hitachi Displays, Ltd.

5 Q. Between October 1, 2002 and November 30,
6 2007, was Hitachi Displays, Ltd. a wholly owned
7 subsidiary of Hitachi, Ltd.?

8 A. Yes.

9 Q. Between December 1, 2007 and today, has
10 Hitachi Displays, Ltd. remained a wholly owned
11 subsidiary of Hitachi, Ltd.?

12 A. No.

13 Q. During the relevant period did Hitachi,
14 Ltd. have the ability to remove officers or directors
15 at Hitachi Displays, Ltd.?

16 A. After the formation of Hitachi Displays,
17 Ltd. on October 1, 2002 and before the end of the
18 relevant period, Hitachi, Ltd. had the ability to
19 remove Hitachi Displays, Ltd.'s directors. Hitachi,
20 Ltd. did not have the ability to appoint Hitachi
21 Displays, Ltd.'s officers during the relevant period.

22 Q. During the relevant period, did Hitachi,
23 Ltd. have the ability to appoint officers or
24 directors at Hitachi Displays, Ltd.?

25 A. After the formation of Hitachi Displays,

1 Ltd. on October 1, 2002 and before the end of the
2 relevant period, Hitachi, Ltd. had the ability to
3 appoint Hitachi Displays, Ltd.'s directors. Hitachi,
4 Ltd. did not have the ability to appoint Hitachi
5 Displays, Ltd.'s officers.

6 Q. During the relevant period, did Hitachi,
7 Ltd. have the ability to hire employees at Hitachi
8 Displays, Ltd.?

9 A. No.

10 Q. During the relevant period, did Hitachi,
11 Ltd. have the ability to fire employees at Hitachi
12 Displays, Ltd.?

13 A. No.

14 Q. Between January 1, 1995 and December 31,
15 2007, what was the percentage amount, if any, of
16 Hitachi America, Ltd.'s ownership share in Hitachi
17 Electronic Devices (USA), Inc.?

18 A. Hitachi America, Ltd. had a 100 percent
19 ownership interest in Hitachi Electronic Devices
20 (USA), Inc. during the period.

21 Q. During the relevant period, was Hitachi
22 Electronic Devices (USA), Inc. a wholly owned
23 subsidiary of Hitachi America, Ltd.?

24 A. Yes.

25 Q. During the relevant period, did Hitachi,

1 Electronic Devices (USA), Inc. to increase or
2 decrease prices for the CRTs sold by Hitachi
3 Electronic Devices (USA), Inc.?

4 A. No.

5 Q. During the relevant period, did Hitachi
6 Displays, Ltd. have the ability to determine or
7 modify budgetary decisions made by Hitachi Electronic
8 Devices (USA), Inc.?

9 A. No.

10 Q. Between January 1, 1995 and September 30,
11 2002, what was the percentage amount, if any, of
12 Hitachi, Ltd.'s ownership share in Shenzhen SEG
13 Hitachi Color Display Devices, Ltd.?

14 A. Hitachi, Ltd. had a 25 percent ownership
15 share in Shenzhen SEG Hitachi Color Display Devices,
16 Ltd. from January 1, 1995 to September 30, 2002.

17 Q. Between October 1, 2002 and November 7,
18 2007, what was the percentage amount, if any, of
19 Hitachi, Ltd.'s ownership share in Shenzhen SEG
20 Hitachi Color Display Devices, Ltd.?

21 A. Hitachi, Ltd. had no ownership share of
22 Shenzhen SEG Hitachi Color Display Devices, Ltd. from
23 October 1, 2002 to November 7, 2007.

24 Q. Between October 1, 2002 and November 7,
25 2007, what was the percentage amount, if any, of

1 Hitachi Display, Ltd.'s ownership share in Shenzhen
2 SEG Hitachi Color Display Devices, Ltd.?

3 A. Hitachi Displays, Ltd. had a 25 percent
4 ownership share in Shenzhen SEG Hitachi Color Display
5 Devices, Ltd. from October 1, 2002 to November 7,
6 2007.

7 Q. When, if ever, did Hitachi, Ltd. sell its
8 ownership share in Shenzhen SEG Hitachi Color Display
9 Devices, Ltd.?

10 A. Hitachi, Ltd.'s Display Group was spun off
11 to form Hitachi Displays, Ltd. on October 1, 2002.
12 At that time, Hitachi, Ltd.'s ownership share in
13 Shenzhen SEG Hitachi Color Display Devices, Ltd. was
14 transferred to Hitachi Displays, Ltd.

15 Q. When, if ever, did Hitachi Displays, Ltd.
16 sell its ownership share in Shenzhen SEG Hitachi
17 Color Display Devices, Ltd.?

18 A. Hitachi Displays, Ltd. sold its minority
19 ownership share in Shenzhen SEG Hitachi Color Display
20 Devices, Ltd. through an agreement executed on
21 November 8, 2007.

22 Q. Between January 1, 1995 and November 7,
23 2007, did Hitachi, Ltd. have the ability to remove
24 officers or directors at Shenzhen SEG Hitachi Color
25 Display Devices, Ltd.?

1 A. No.

2 Q. Between January 1, 1995 and November 7,
3 2007, did Hitachi, Ltd. have the ability to appoint
4 officers or directors at Shenzhen SEG Hitachi Color
5 Display Devices, Ltd.?

6 A. From January 1, 1995 to September 30,
7 2002, as a minority shareholder, Hitachi, Ltd. had
8 the ability to appoint three of the seven members of
9 Shenzhen SEG Hitachi Color Display Devices, Ltd.'s
10 board of directors. From October 1, 2002 through
11 November 7, 2007, Hitachi, Ltd. did not have the
12 ability to appoint any members of Shenzhen SEG
13 Hitachi Color Display Devices' board of directors.

14 Q. Between January 1, 1995 and November 7,
15 2007, did Hitachi, Ltd. have the ability to hire
16 employees at Shenzhen SEG Hitachi Color Display
17 Devices, Ltd.?

18 A. No.

19 Q. Between January 1, 1995 and November 7,
20 2007, did Hitachi, Ltd. have the ability to fire
21 employees at Shenzhen SEG Hitachi Color Display
22 Devices, Ltd.?

23 A. No.

24 Q. Between October 1, 2002 and November 7,
25 2007, did Hitachi Displays, Ltd. have the ability to

1 officers and then 97 is appointment of officers,
2 so we are doing appointment of officers?

3 MR. ADELSON: This is for the removal of
4 officers.

5 MR. RANDALL: Okay.

6 MR. ADELSON: You didn't use numbers
7 throughout, so the question that I just read,
8 which is about the removal of officers and
9 directors between '95 and 2007.

10 THE WITNESS: I answered "no." "No" is
11 only accurate for part of the period.

12 From January 1, 1995 to September 30,
13 2002, as a minority shareholder, Hitachi, Ltd. had
14 the ability to remove three of the seven members
15 of Shenzhen SEG Hitachi Color Display Devices,
16 Ltd.'s board of directors.

17 From October 1, 2002 through November 7,
18 2007, Hitachi, Ltd. did not have the ability to
19 remove any members of Shenzhen SEG Hitachi Color
20 Display Devices, Ltd.'s board of directors.

21 I apologize for the oversight.

22 MR. RANDALL: Okay.

23 MR. ADELSON: We would like to order a
24 rough unless you can get the final done today or
25 tomorrow.

C E R T I F I C A T E

STATE OF FLORIDA:

COUNTY OF MIAMI-DADE:

I, the undersigned authority, certify that
PATRICK BARRETT personally appeared before me on
November 4, 2014 and was duly sworn by me.

WITNESS my hand and official seal this 4th
day of November, 2014.

BEVERLY BOURLIER JAMES

My Commission #EE091768

Expires September 9th, 2015

C E R T I F I C A T E

STATE OF FLORIDA:

COUNTY OF MIAMI-DADE:

I, BEVERLY BOURLIER JAMES, a Notary Public
for the State of Florida at Large, hereby certify
that I reported the deposition of PATRICK BARRETT;
and that the foregoing pages constitute a true and
correct transcription of my shorthand report of the
deposition by said witness on this date.

I further certify that I am not an attorney
or counsel of any of the parties, nor a relative or
employee of any attorney or counsel connected with
the action nor financially interested in the action.

WITNESS my hand and official seal in the
State of Florida, this 4th day of November, 2014.

BEVERLY BOURLIER JAMES

Registered Professional Reporter

Certified Realtime Reporter

Certified LiveNote Reporter

Florida Professional Reporter

NCRA Realtime Systems Administrator

EXHIBIT 2

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EXHIBIT 13



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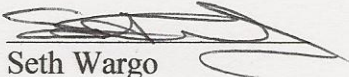
STATE of NEW YORK)
)
COUNTY of NEW YORK)

ss:


CERTIFICATE OF ACCURACY

This is to certify that the attached document, "*KFTC decision*", originally written in *Korean* is, to the best of our knowledge and belief, a true, accurate, and complete translation into *English*.

Dated: September 25, 2012


Seth Wargo
Consortra Translations

Sworn to and signed before ME this
25th day of September,
2012.


Notary Public

JAMES G MAMERA
Notary Public, State of New York
No. 01MA6157195
Qualified in New York County
Commission Expires Dec. 4, 2014

Fair Trade Commission

Multi-party Meeting

Decision no. 2011-019

March 10, 2011

Case number: 2010Gukka2364

Case name: Wrongful joint actions by the 5 computer color monitor CDT manufacturers

Defendants: 1. Samsung SDI

428-5 Gongse-dong, Giheung-gu, Yongin-si

Representative Director: ○ ○ Choi

Agent: Shin & Kim

Attorneys at law: Jung Won Park, Min Ho Lee, Oh Tae Kwon

Agent: Apex Law Firm

Attorney at law: Jung Hee Kang

2. LG Philips Display

184 Gongdan 1-dong, Gumi-si

(Delivery address: Kyungbuk Samil Law Firm 34-3 Songjeong-dong, Gumi-si)

Temporary Representative Director: ○ ○ Kim

3. Chunghwa Picture Tubes, Ltd.

No. 1127 Heping Rd. Bade City, Taoyuan, 334, China (Taiwan)

Representative Director: Lin Wei Shan

4. Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.

Lot 1 Subang Hi-Tech Industrial Park Batu Tiga 40000 Shah Selangor, Malaysia
Representative Director: Kuang-Lang Chen

5. CPTF Optronics Co., Ltd.

No. 1 Xin Ye Road, Mawai Hi-Tech Development Zone, Fuzhou, China

Representative Director: Sheng-Chang Lin

The agent for the defendants 3 through 5: Yoon & Yang

Attorneys at law: Ho Il Yoon, Jae Yung Kim, Dong Young Han

Text

1. The defendant Samsung SDI, the defendant Chunghwa Picture Tubes, Ltd., the defendant Chunghwa Picture Tubes (Malaysia) Sdn. Bhd, and the defendant CPTF Optronics Co., Ltd. should pay the following fines to the government coffers.

A. Penalties

(1) Defendant Samsung SDI:	24,013,000,000 won
(2) Defendant Chunghwa Picture Tubes, Ltd.:	2,198,000,000 won
(3) Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.:	32,000,000 won
(4) CPTF Optronics Co., Ltd.:	28,000,000 won

B. Payment due date: Within the due date indicated in the penalty notification (60 days)

C. Place of payment: The Bank of Korea (Treasury Collecting Agency) or post office

	CAPA	Original Production Plan	Reduce Production	Production Plan (Unit: 1,000)
SDD	1,800	1,500	△60	1,440
LG	1,830	800	△30	770
Orion	100	10	-	10
Chunghwa	900	810	△30	780
Philips	840	800	△30	770
Total sum	5,470	3,920	△150	3,770

□ Two-party meeting on Aug. 21, 1998

106 In the two-party meeting between Hitachi and Chunghwa Picture Tubes, Liu of Chunghwa Picture Tubes had confirmed that the CDT manufacturers of China and Korea had succeeded in a price increase (as in following) according to the previous agreement, and indicated that there was a plan to increase the price again around October of the same year.

Director Liu **confirmed** that the manufacturers of China and Korea had **adjusted the price from the first quarter to Aug. successfully**, as in the following.

14" MPRE	USD 50.0
15" MPRE	USD 60.0
17" MPRE	USD 93.0
TCD	USD 96.0

Additionally, there is an intention to increase the price again in October due to market development and because the current price is barely maintained with the level of price that does not incur a loss. (These can decide the range of price increase in late August or early September.)

(Evidence Sogap Number 3-56)

107 The fact of a mutual confirmation as to whether or not Samsung Electronic Tube had increased the price targeting Samsung Electronics as the agreement is confirmed from the written contents of "(3) the other" clause of customer contact report of Chunghwa Picture Tubes, and consequently it is possible to know that Samsung Electronics is included in carrying out the objective among CDT manufacturers.

Therefore, he has a question as to whether or not SDD had already increased the SEC price. Mr. Jang said the main concern that he is considering is that Taiwanese manufacturers do not have the largest loss because of a small action of Korean manufacturers after this one-time CDT price increase. Based on several meetings, Director Liu explained that the position of SDD regarding the price increase is very strong. Additionally, he said that he would raise an objection and request to confirm to SDD about the matter of the increase in the SEC price. Both of the parties agreed to pay attention to the deployment of the market situation and to maintain information exchange. (Evidence Sogap Number 3-56)

□ Multi-party meeting on Sept. 2, 1998

the fact is that the domestic and foreign market or the industry's objective circumstances or conditions' rapidly change and therefore the CDT market has disappeared, it is deemed that imposition of the discretionary adjusted fine amount is excessive and therefore 70% of the discretionary adjusted fine amount is reduced pursuant to Announcement of Fine 4. A. (2)'s regulation. However, any amount less than 1 million won is removed pursuant to Announcement of Fine 4. E.'s regulation. The imposed fine amount per defendant is as noted below in <Table 30>.

<Table 30> Imposed Fine Amount (1000 Won, %)

Defendant	Discretionary Adjusted Fine Amount	Reduction Rate	Imposed Fine Amount	Limits on Imposed Fine Amount	
				5% of 3 year average sales amount	3 year average sales amount
Samsung (SDI)	80,046,482	70	24,013,944	276,998,000	5,539,965,000
LPD (LPD)	19,572,493	100	0	42,371,000	847,437,000
Chunghwa Picture Tubes	7,326,669 (TWD 190,253,684)	70	2,198,000 (TWD 57,076,105)	110,111,000	2,202,227,000
Chunghwa Picture Tubes Malaysia	108,555 (RWD 2,818,880)	70	32,566 (TWD 845,664)	19,981,000	399,636,000
Chunghwa Picture Tubes Fuzhou	96,653 (TWD 2,509,838)	70	28,996 (TWD 752,951)	34,472,000	689,442,000

*Taiwan dollar (TWD) is converted at the amount of 1 TWD = 38.51 won

5. Conclusion

321 The defendants' actions of above 2. A. are in violation of Article 19 Section 1 Clause 1 and Clause 3, and therefore the decision is hereby rendered as contained in the main text by applying the regulations of Article 22 for the order to pay a fine.

The Fair Trade Commission hereby renders its decision as noted above.

March 11, 2011

Chairperson **Commission Chairman** Dong Soo Kim

Chief Commissioner **Hak Hyun Kim**

Commissioner Young Ho Ahn

Commissioner Myung Cho Yang

Commissioner Hong Kwon Lee

Commissioner Sung Hoon Chun

Commissioner Jong Won Choi

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EXHIBIT 17

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11 Attorneys for Defendants
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 12 HITACHI AMERICA, LTD., HITACHI
 ELECTRONIC DEVICES (USA), INC. AND
 13 HITACHI DISPLAYS, LTD. (n/k/a JAPAN
 DISPLAY EAST, INC.)
 14

15
 16 UNITED STATES DISTRICT COURT
 17 NORTHERN DISTRICT OF CALIFORNIA
 18 SAN FRANCISCO DIVISION

19 IN RE: CATHODE RAY TUBE (CRT)
 20 ANTITRUST LITIGATION,

Case No. 07-5944 SC
 MDL No. 1917

21 This Document Relates To:
 22 ALL ACTIONS
 23
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**DECLARATION OF YASUHIKO
 KAWASHIMA SUPPLEMENTING
 HITACHI, LTD.'S AND HITACHI
 DISPLAYS, LTD.'S 30(b)(6) DEPOSITION**

1 I, Yasuhiko Kawashima, declare as follows:

2 1. I am currently the Associate Account Manager of the Sales Division in the
3 Overseas Sales Department of Japan Display, Inc. and have been designated as a 30(b)(6) witness
4 to testify on behalf of Hitachi, Ltd. ("HTL") and Hitachi Displays, Ltd. ("HDP") with respect to
5 their CRT tube business. This declaration serves as a supplement to the testimony I provided on
6 July 18 and 19, 2012. As a designated 30(b)(6) witness, I have been informed and believe to be
7 true the facts herein, and if called as a witness, I could and would competently testify thereto.

8 2. HTL's Electron Tube Division responsible for the manufacture and sale of CRT
9 tubes was spun off to HDP in October 2002 after HTL announced that it was withdrawing from
10 the manufacture and sale of CRT tubes. Thus, HDP never sold or manufactured CRT tubes and
11 only retains documents and information relating to HTL's manufacturing and sale of CRT tubes.
12 Any references in this Declaration to the manufacture and sale of CRT tubes relates to HTL's
13 Electron Tube Division's practices and policies from the beginning of the Class Period as defined
14 by Indirect Purchasers' Third Consolidated Complaint ("Relevant Period") until the October 2002
15 spinoff.

16 3. HTL was considered a high-quality, top-tier manufacturer of CRT tubes. In the
17 early 1990s, HTL considered only Japanese manufacturers to be competitive in terms of quality in
18 the CRT tube market. Taiwanese and Korean companies' performance and quality were lower
19 and thus HTL believed they had different customer bases. However, Taiwanese and Korean
20 manufacturers' performance and quality improved in the latter half of the 1990s, and thus HTL
21 began to consider them as competitors at that time.

22 4. HTL's only U.S. customer for CRT tubes during the Relevant Period was Aydin.

23 5. HTL manufactured CRT tubes of varying sizes and quality based on specifications
24 provided by its customers. HTL did not manufacture off-the-shelf tubes or "spot market" tubes to
25 any of its customers. CRT tubes that have been manufactured to different specifications are not
26 interchangeable with one another.

27 6. HTL worked closely with each customer to develop CRT tube specifications.
28 HTL designed and manufactured its CRT tubes to meet various size and performance

1 specifications of its customers, including CPT or CDT technology, resolution, surface processing,
2 surface curvature, surface length, type of phosphor, type of electron gun, and type of deflection
3 yoke.

4 7. HTL did not track the flow of monitors or televisions that contained its CRT tubes
5 into the United States market.

6 8. HTL did not submit any of its sales data regarding CRT tubes to third-party market
7 research companies.

8 9. For all sales, customers would approach an HTL sales representative and indicate
9 the specifications for the CRT tube it required and request a pricing proposal. The sales
10 representative would collect the specification information from the customer and deliver the
11 specification information to HTL's marketing department.

12 10. Upon receiving the specifications and pricing request, the marketing department or
13 factories would work with the design department to consider the input material costs. Each
14 specification requested by the customer, including the size of the tube, whether the CRT tube was
15 a CPT or CDT, the resolution, surface processing, surface curvature, surface length, the type of
16 phosphor, the electron gun, and the type of deflection yoke, would impact the price of the CRT
17 tube. HTL's marketing department considered the cost of the inputs, potential profitability, and
18 its relationship with the customer; investigated prices in the market for comparable products; and
19 reviewed third party market analyses to determine a price proposal for the customer. This process
20 for determining prices was the same regardless of whether the customers were located in the U.S.
21 or Japan.

22 11. HTL did not maintain standard price lists, price guidelines, or a set pricing formula
23 for the CRT tubes it manufactured or sold. HTL also did not monitor retail prices or street prices
24 of CRT Finished Products. Such retail and street prices did not have any impact on HTL's
25 pricing of CRT tubes.

26 12. Once the marketing department determined a price to be offered to a customer, it
27 would convey the price to the sales department, which would then communicate the price to the
28 customer. The sales department did not have any authority to change the price communicated to

1 a customer. The sales department would convey any pricing reduction requests from the
2 customer back to the marketing department.

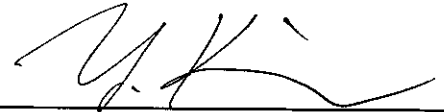
3 13. HTL typically did not offer discounts or rebates to its customers. HTL also did not
4 offer MFN or MFC clauses, or any similar price protection guarantee, to its customers. The
5 incentive pricing that HTL considered for CRT tubes was based on the quantity the customer
6 ordered. The three types of quantity-based discounts that HTL offered are described as follows:
7 (i) HTL gave customers a discount if the volume purchased by the customer reached a certain
8 level in a given quarter. In most instances, this discount did not apply retroactively and only
9 applied to sales above a certain level; (ii) If a customer ordered a certain volume during a single
10 order, HTL gave the customer a discounted price that applied to that one large volume order; and
11 (iii) HTL sometimes adopted a "step-up price" mechanism, in which the amount of the discount
12 would increase when the customer increase its purchase volume. In most instances, this discount
13 did not apply retroactively, and only applied to sales above a certain level.

14 14. Managers of the Marketing Department of the Displays Group of Hitachi, Ltd. had
15 pricing authority for CRTs, which included the following individuals during the Relevant Period:
16 Kazuo Oohashi who served as Manager of the Marketing Department of the Displays Group from
17 1995-2000; Yuuichi Kumazawa who served as the Manager of the Marketing Department of the
18 Displays Group from 2001-2002; Hidetake Ono who served as Department Manager of the
19 Marketing Department of the Displays Group from 1995-1999; Genichi Watanabe who served as
20 the Department Manager of the Market Department of the Displays Group from 2000-2002 and
21 as the Deputy General Manager of Display Group from 1995-2002.

22 15. Once HTL and the customer agreed upon the specifications, prices and target
23 quantities for the CRT tubes, HTL would memorialize the terms of the agreement in meeting
24 minutes. These meeting minutes were maintained by HTL's sales department. Customers
25 submitted purchase orders to HTL for specific orders based on the terms of the meeting minutes,
26 and information from these purchase orders were input into an electronic database called the
27 MORE system, which was also maintained by the sales department.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 21th day of December, 2012, at Tokyo, Japan.

4
5 

6 Yasuhiko Kawashima
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EXHIBIT 18

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